



U.S. Department  
of Transportation

**Pipeline and Hazardous  
Materials Safety  
Administration**

1200 New Jersey Avenue, SE  
Washington, DC 20590

November 28, 2023

Mr. Daniel Shelton  
President  
Hazmat Resources, Inc.  
141 Wendover Dr.  
Kingsport, TN 27660

Reference No. 23-0056

Dear Mr. Shelton:

This letter is in response to your June 20, 2023, email and subsequent phone call with a member of my staff requesting clarification of the Hazardous Materials Regulations (HMR; 49 CFR Parts 171-180) applicable to the description of hazardous materials on shipping papers. In your email, you reference the letter “G” in Column 1 of the § 172.101 Hazardous Materials Table (HMT). The letter “G” in Column 1 of the HMT identifies proper shipping names for which one or more technical names of the hazardous material must be entered in parenthesis in association with the basic description. In the subsequent phone call, you requested clarification as to when the inclusion of a technical or chemical name would be acceptable for a hazardous material listed in the HMT that does not have the letter “G” in Column 1. As an example, you note that the entry “UN1987 Alcohol, n.o.s., Class 3, PG III” does not have the letter “G” in Column 1 in the HMT and ask whether the following description is in compliance with the HMR: UN1987 Alcohol n.o.s., (Denatured Alcohol and Ethanol), Class 3, PGIII (1 Tank).

The HMT has several entries that do not include the letter “G” in Column 1 of the HMT, such as “UN1987 Alcohol n.o.s.” However, as provided in § 172.202(d), technical and chemical group names may be entered in parenthesis between the proper shipping name and hazard class or following the basic description. It is the opinion of this Office that the addition of the text, “(Denatured Alcohol and Ethanol)” in association with the basic description as provided in your example is an acceptable description of the hazardous material on a shipping paper. Further, an appropriate modifier, such as “contains” or “containing,” and/or the percentage of the technical constituent may also be used.

I hope this information is helpful. Please contact us if we can be of further assistance.

Sincerely,

T. Glenn Foster  
Chief, Regulatory Review and Reinvention Branch  
Standards and Rulemaking Division

Vore

23-0056

**From:** [INFOCNTR \(PHMSA\)](#)  
**To:** [Dodd, Alice \(PHMSA\)](#)  
**Cc:** [Hazmat Interps](#)  
**Subject:** FW: Request for Interpretation  
**Date:** Monday, June 26, 2023 5:03:55 PM  
**Attachments:** [image001.png](#)

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Hi Alice,

Please see the below interpretation request.

Let us know if you need anything.

Regards,

-Breanna

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**From:** Daniel Shelton <dshelton@hazmatresources.com>  
**Sent:** Tuesday, June 20, 2023 8:00 PM  
**To:** INFOCNTR (PHMSA) <INFOCNTR.INFOCNTR@dot.gov>  
**Subject:** Request for Interpretation

**CAUTION:** This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Alcohol N.O.S. does not have G in column 1 of the HM Table. In accordance with 49 CFR § 172.202(b) which states in part the following: “Except as provided in this subpart, the basic description specified in paragraphs (a)(1), (2), (3), and (4) of this section must be shown in sequence with no additional information interspersed.” Is the following shipping description correct:

**UN1987 Alcohol N.O.S., (Denatured Alcohol and Ethanol), Class 3, PGIII (1 Tank)**

**Best Regards**

**Daniel G. Shelton**  
**President**  
**Hazmat Resources, Inc.**  
**Main Number: 423.863.2252**

